

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

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| <p>VALERIE ANDERSON, individually and on behalf of all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>FORTRA LLC,</p> <p>Defendant.</p> | <p>Case No. 23-cv-00533 (SRN/DTS)</p> |
| <p>ROBERT TAYLOR, individually and on behalf of all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>FORTRA LLC,</p> <p>Defendant.</p> | <p>Case No. 23-cv-00539 (SRN/DTS)</p> |
| <p>EDWARD HUBLER, individually and on behalf of all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>FORTRA LLC,</p> <p>Defendant.</p> | <p>Case No. 23-cv-00545 (SRN/DTS)</p> |

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| <p>MUHAMMAD ZAHID, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>FORTRA LLC,</p> <p style="text-align: center;">Defendant.</p> | <p>Case No. 23-cv-00615 (SRN/DTS)</p> |
| <p>ALAUNTAE BUTTS, et al., individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>FORTRA LLC,</p> <p style="text-align: center;">Defendant.</p> | <p>Case No. 23-cv-00636 (SRN/DTS)</p> |

PLAINTIFFS' UNOPPOSED MOTION FOR CONSOLIDATION OF RELATED ACTIONS

Pursuant to Federal Rules of Civil Procedure 42(a) and Judicial Orders for Reassignment of Related Cases, Plaintiffs in the above-captioned actions respectfully move to consolidate five related putative class actions now pending before this Court:

- *Anderson v. Fortra LLC*, Case No. 23-cv-00533 (SRN/DTS) (D. Minn.) filed on March 6, 2023;
- *Taylor v. Fortra LLC*, Case No. 23-cv-00539 (SRN/DTS) (D. Minn.) filed on March 6, 2023
- *Hubler v. Fortra LLC*, Case No. 23-cv-00545 (SRN/DTS) (D. Minn.) filed on March 8, 2023;

- *Zahid v. Fortra LLC*, Case No. 23-cv-00615 (SRN/DTS) (D. Minn.) filed on March 13, 2023; and
- *Butts, et al. v. Fortra LLC*, Case No. 23-cv-00636 (SRN/DTS) (D. Minn.) filed on March 15, 2023.

Plaintiffs also respectfully request the Court adjourn all deadlines for Defendant to file a responsive pleading until Plaintiffs' Court-appointed interim leadership has been ordered by the Court, Plaintiffs' interim leadership files a Consolidated Complaint, and an appropriate responsive pleading schedule is established.

This Motion is based upon the Memorandum of Law filed contemporaneously herewith, and upon all files, records, and proceedings in this matter.

Dated: March 28, 2023

/s/ Bryan L. Bleichner

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**Pro hac vice applications forthcoming*